

# Environmental News for Wood Furniture Manufacturers

OPPTA/CTAP Indiana Department of Environmental Management

June 2000

## A quick note.....

This newsletter will not be a regular occurrence, but instead is providing an update on a few of the environmental regulations affecting your industry as well as the progress Indiana wood furniture manufacturers have made in reducing emissions. If you have any questions or comments about the information included in this newsletter, please contact Karen Teliha at 800-988-7901.



## IDEM's Environmental Permit Guide

Information regarding environmental permits is now just a mouse click away. IDEM's new electronic Permit Guide can be a useful tool to identify environmental permits and certifications necessary to stay in compliance with the law. The guide is linked to all IDEM guidance documents and applications. Check it out at [www.state.in.us/idem/guides/permit](http://www.state.in.us/idem/guides/permit).

## State sees Significant Decreases in the Emissions from the Wood Furniture Industry

In data from the 1998 Toxic Release Inventory (TRI), Indiana wood furniture manufacturers reported 2,426,043 pounds of emissions to the environment, mainly to the air. This is down from 1996 reported TRI emissions of 5,145,465 pounds. This is a reduction of nearly 53%.

The drop in emissions is due heavily to the implementation of the Wood Furniture NESHAP in late 1997 and 1998. The NESHAP focuses on reducing the use and release of hazardous air pollutants such as toluene and xylene. Pollution prevention efforts by many wood furniture manufacturers have also resulted in significant emission decreases.

In Indiana, 54 manufacturers are subject to the wood furniture NESHAP. Of those, approximately 44 wood furniture manufacturers reported emissions to the TRI in 1998.

Indiana's Toxic Release Inventory  
[www.state.in.us/idem/oppta/tri](http://www.state.in.us/idem/oppta/tri)

Governor's Toxic Reduction Challenge  
[www.state.in.us/idem/oppta/govawards/toxicchallenge.html](http://www.state.in.us/idem/oppta/govawards/toxicchallenge.html)

## Indiana TRI Emissions on Track to Meet Governor's Reduction Goal

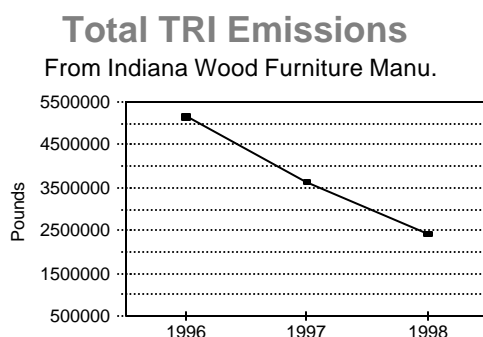
Statewide, 1998 toxic chemical releases dropped 8 percent from the previous year, continuing the eight-year downward trend for chemicals and industries covered under the original TRI reporting requirements.

Toluene decreased 15 percent from 7.2 to 6.1 million pounds. A portion of this drop can be attributed to the over million pound decrease in emissions reported from the wood furniture industry from 1997 to 1998.

The continued downward trend also moves the state closer to meeting Governor Frank O'Bannon's Toxic Reduction

Challenge. He challenged Indiana manufacturers two years ago to support Indiana's goal to reduce total releases reported to the TRI by 50 percent of 1995 levels by December 31, 2002. After two reporting periods (1998 and 1999), the manufacturing community has met 25 percent of this 50 percent challenge goal.

If emissions at your facility are decreasing, you may want to consider joining the Governor's Toxics Reduction Challenge and receiving recognition for efforts to reduce emissions at your plant.



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## NESHAP Semiannual Compliance Status Reports—Choosing the Best Form

For those sources who must comply with the NESHAP, semiannual compliance status reports must be submitted to both IDEM and EPA Region V by January 30 and July 30 of each year. You may have noticed a form in your Title V permit which can be used to satisfy these reports. If you use the form in the Title V permit for semiannual NESHAP reporting, you must include a statement that you are implementing the work practice plan. You will need to write this on the form since it is not included. Or you may use the form distributed by IDEM last year (available on the web at [www.state.in.us/idem/ctap/wood/news.html](http://www.state.in.us/idem/ctap/wood/news.html)) If you are not using one of these forms, you may not be submitting all the necessary information, which will result in violations. Letters to IDEM or EPA simply stating you are in compliance are not acceptable.

### Upcoming NESHAPs

- Wood Building Products  
[www.epa.gov/ttn/uatw/coat/flatw/flat\\_pan.html](http://www.epa.gov/ttn/uatw/coat/flatw/flat_pan.html)
- Plywood and Composite Wood Products  
[www.epa.gov/ttn/uatw/plypart/plypart.html](http://www.epa.gov/ttn/uatw/plypart/plypart.html)
- Metal Furniture  
[www.epa.gov/ttn/uatw/coat/mfurn/met\\_furn.html](http://www.epa.gov/ttn/uatw/coat/mfurn/met_furn.html)

\*For a list of all Upcoming MACT Standards, see [www.epa.gov/ttn/uatw/mactupd.html](http://www.epa.gov/ttn/uatw/mactupd.html)

## Correction to Definition of a NESHAP Area Source

Area Sources are exempt from the Wood Furniture NESHAP (40 CFR 63, Subpart JJ). But a letter sent to Indiana wood furniture minor sources from IDEM two years ago incorrectly stated the definition of an area source. To be exempt from the Wood Furniture NESHAP, a facility must satisfy **one** of the following categories:

- a. Facility uses less than 100 gallons per month of wood furniture coatings and adhesives but is a major source due to other operations. This facility is called an Incidental Furniture Manufacturer, or
- b. Facility uses less than 250 gallons per month or less than 3000 gallons per rolling 12 month period of finishing, gluing, cleaning, and washoff material, including materials used in processes other than wood furniture manufacturing. This facility is called an Area Source, or
- c. Facility emits no more than 5 tons of any one HAP per rolling 12-month period or no more than 12.5 tons of any combination of HAP per rolling 12-month period, including emissions from processes other than wood furniture and **at least** 90 percent of the plantwide emissions per rolling 12-month period are associated with the manufacture of wood furniture or wood furniture components.

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## Counties facing Non-Attainment Status for Ozone

Currently, Indiana has five counties where air quality exceeds the one-hour ozone standard and six metropolitan areas where ozone levels exceed the eight-hour standard established by the U.S. EPA in 1997. The eight-hour standard is 85 parts per billion (ppb) and is based on an average of the 4th highest 8-hour ozone readings over a three year period. While the eight-hour standard is being challenged in court, IDEM is pursuing measures to meet the one-hour standard by reducing ozone contributing emissions and improving air quality throughout Indiana.



The Indiana Department of Environmental Management (IDEM) operates 33 ozone monitors across Indiana. All of these monitors, except Bristol in Elkhart County, measured ozone values in excess of 85 ppb at least once during 1999.

The highest 8-hour reading was 109 ppb recorded at New Albany, Indiana. The highest number of days in which the health standard was not met at a monitor was 18 days.

If the court decides the 8-hour standard should go into effect, several counties in Indiana will be affected, but official designations have not been made.

## Calendar of Important Environmental Deadlines to Remember

(Although every effort has been made to ensure accuracy and completeness of this information, IDEM cannot guarantee that it is completely free of any omissions. It is ultimately the responsibility of the owner and operator to ensure that the facility complies with all applicable regulations.)

<b>January 28</b>	<b>Stormwater Annual Report due if sampling reports, visual inspection reports, etc. have not yet been submitted during the past year. Visual inspections of each outfall or representative outfall are required for two storm events each year during the Third Year of regulation and beyond. (IDEM-OWM)</b>	<b>April 30</b>	<b>Quarterly Air Compliance Report due for January through March (IDEM-OAM)</b>
<b>January 30</b>	<b>Quarterly Air Compliance Report due for October through December (IDEM-OAM)</b>	<b>April 30</b>	<b>Quarterly VOC Report due for January through March (IDEM-OAM)</b>
<b>January 30</b>	<b>Quarterly VOC Report due for October through December (IDEM-OAM)</b>	<b>July 1</b>	<b>Annual Emission Statement due for companies not required to submit on April 15 (IDEM-OAM)</b>
<b>January 30</b>	<b>Wood Furniture NESHAP Semiannual Compliance Status Report for July to December due (IDEM-OAM)</b>	<b>July 1</b>	<b>Annual Compliance Certification due for companies not required to submit on April 15 (IDEM-OAM)</b>
<b>February 1</b>	<b>Post previous year's Log and Summary (OSHA)</b>	<b>July 1</b>	<b>SARA 313 Toxic Release Inventory report due</b>
<b>March 1</b>	<b>Tier II Reports due to State EMC, LPC, and Fire Department</b>	<b>July 1</b>	<b>USDOT Hazardous Material Registration due</b>
<b>March 1</b>	<b>US EPA Hazardous Waste Report due during even numbered calendar years (2002, 2004, 2006, etc.) (IDEM-OLQ)</b>	<b>July 30</b>	<b>Quarterly Air Compliance Report due for April through June (IDEM-OAM)</b>
<b>March 1</b>	<b>IDEM Annual Manifest Report due during odd numbered calendar years (2003, 2005, 2007, etc.) (IDEM-OLQ)</b>	<b>July 30</b>	<b>Quarterly VOC Report due for April through June (IDEM-OAM)</b>
<b>April 15</b>	<b>Annual Emission Statement due for companies in Clark, Elkhart, Floyd, Lake, Marion, Porter, St. Joseph, and Vanderburgh counties (IDEM-OAM)</b>	<b>July 30</b>	<b>Wood Furniture NESHAP Semiannual Compliance Status Report for January to June due (IDEM-OAM)</b>
<b>April 15</b>	<b>Annual Compliance Certification due for companies in Clark, Elkhart, Floyd, Lake, Marion, Porter, St. Joseph, and Vanderburgh counties (IDEM-OAM)</b>	<b>October 30</b>	<b>Quarterly Air Compliance Report due for July through September (IDEM-OAM)</b>
		<b>October 30</b>	<b>Quarterly VOC Report due for July through September (IDEM-OAM)</b>

(\*Original Information from the AFMA Environmental Guide)

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# **Be sure you don't fall into one of these Top 10 Lists**

## **Top 10 OSHA Violations for Indiana Wood Furniture Manufacturers (1996-1998)**

1. Grounding Paths [1910.304 (f)(4)]
2. Personal Protective Equipment, Hazard assessment and equipment selection [1910.132 (d)(2)]
3. Employee Emergency Plans and Fire Prevention Plans [1910.38 (a)(1)]
4. Guarding of live parts [1910.303 (g)(2)]
5. Marking electrical equipment [1910.303 (e)]
6. Exposure adjustment for guarding of abrasive wheel machinery [1910.215 (b)(9)]
7. Log and summary of occupational injuries and illnesses (1904.2)
8. Written Hazard Communication Plan [1910.1200 (e)(1)]
9. Compressed air used for cleaning [1910.242 (b)]
10. Work rests on abrasive wheel machinery [1910.215 (a)(4)]

## **Top 10 Hazardous Waste Violations for all Indiana Industries (1998)**

1. Lack of a proper waste determination [40 CFR 262.11]
2. Satellite containers of hazardous waste not properly managed [40 CFR 262.34(c)(1)]
3. Containers not marked with the words "Used Oil" [40 CFR 279.22(c)/329 IAC 13-4-3]
4. Hazardous waste containers not marked with the start of accumulation date [40 CFR 262.34(a)(2)]
5. Lack of training or training documents [40 CFR 262.34/265.16; 264.16]
6. Containers not marked with the words "Hazardous Waste" [40 CFR 262.34(a)(3)]
7. Lack of a proper contingency plan [40 CFR 262.34/265.52; 264.52]
8. Satellite containers not properly marked [40 CFR 262.34(c)(1)(ii)]
9. Release of contaminants [IAC 13-30-2-1-4]
10. Hazardous waste containers not closed [40 CFR 262.34/265.173(a); 264.173(a)]

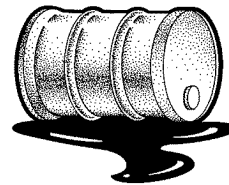
## **Top Air Violations for Wood Furniture Manufacturers (1997 – 1999)**

### **For first time NESHAP inspections:**

1. Lack of Certified Product Data Sheet
2. Use of non-compliant finish material
3. Failure to submit an initial compliance report
4. Lack of a leak check program
5. Lack of records to document inspections
6. Open solvent containers
7. Lack of required plans- Preventive Maintenance, Compliance Response and Emergency Reduction Plans
8. Lack of inspection programs and records

### **For follow up NESHAP inspections:**

1. Operator training program not kept current
2. Lack of training records
3. Leak inspection program not current
4. Lack of inspection records
5. Late or missing initial or semi-annual compliance certifications
6. Open solvent containers



For information on regulations affecting wood furniture manufacturing, check the internet at:

[www.state.in.us/idem/ctap](http://www.state.in.us/idem/ctap)

For confidential assistance with environmental regulations, contact IDEM's Compliance and Technical Assistance Program at (800) 988-7901.

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## How has Manifesting changed?

This spring, a bill which affects several hazardous waste manifest requirements was passed. The following are the changes that will take effect January 1, 2001:

1. There will no longer be an Indiana Uniform Hazardous Waste Manifest form.
2. Hazardous waste generators and facilities will no longer be required to purchase or use an Indiana manifest form to ship hazardous waste.
3. Generators shipping waste to Indiana treatment, storage, or disposal facilities will be required to use their States' manifest or the federal uniform hazardous waste manifest if their State does not have their own manifest.
4. Generators and treatment, storage, and disposal facilities will no longer be required to submit copies of their completed manifests to IDEM.
5. Indiana generators and treatment, storage, and disposal facilities are **still required** to put the EPA waste codes on the manifest form used.
6. Generators and treatment, storage, and disposal facilities are **still required** to follow all recordkeeping and reporting requirements.

Please be advised that if you purchase any more manifests during the remainder of the year of 2000, you are still required to pay the eight (\$8) dollar purchasing fee and refunds will not be given if you have a surplus of Indiana manifests at the end of the year. You will still be allowed to use any remaining inventory of Indiana manifests for your shipments of hazardous waste. In addition, Senate Bill 511 has established an annual report which must be submitted to IDEM, on forms provided by IDEM, beginning March 1, 2002 for all small quantity generators (SQGs), large quantity generators (LQGs), and treatment, storage, and disposal (TSD) facilities. The annual report will summarize a company's hazardous waste manifest shipments sent and/or received. SQGs will be required to submit the annual report by March 1 of each year. LQGs and TSD facilities will be required to submit the US EPA Hazardous Waste Report on the years they are due and the IDEM annual report on the other years. The reporting schedule for LQGs and TSD facilities is as follows:

If you have any questions or concerns, please contact Ms. Michelle Weddle at (317)233-4624 or via e-mail [mwweddle@dem.state.in.us](mailto:mwweddle@dem.state.in.us).

March 1, 2002 US EPA Hazardous Waste Report due  
March 1, 2003 IDEM annual manifest report due  
March 1, 2004 US EPA Hazardous Waste Report due  
March 1, 2005 IDEM annual manifest report due, etc...

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## Presence of Chromium in SAPs and NGR Stains

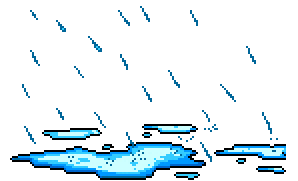
Please carefully test your waste SAP and NGR stains for chromium before disposing of waste products contaminated with these materials. Several manufacturers have detected chromium even when it is not listed on the MSDS or CPDS for the material. If chromium is present, you may need to discard the waste as hazardous.

## Storm Water Monitoring

Lori Gates, from IDEM's Urban Wet Weather Program for Storm Water, spoke to a group of wood furniture environmental managers on May 25 about how the stormwater rules affect this industry. All wood furniture facilities, no matter the size, may potentially need to comply with this rule. To be exempt, you must meet the following:

- a. stormwater must not have contact with any manufacturing, processing, or raw materials storage areas.
- b. If stormwater does come in contact with the above mentioned areas, you can still be exempt if 100% of that stormwater discharges to a combined sewer overflow (CSO) or a publicly owned treatment works (POTW).

A copy of the information presented at the meeting is available on the web at [www.state.in.us/idem/ctap/wood/stormwater.html](http://www.state.in.us/idem/ctap/wood/stormwater.html). To find out if you're exempt from this regulation, please check the web at [www.state.in.us/idem/owm/facmang/storm/stormindex.html](http://www.state.in.us/idem/owm/facmang/storm/stormindex.html) or call Lori Gates at 317-233-6725.



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## DOT Registration Deadline: July 1, 2000

Registration is now required for each person that offers or transports any shipment of hazardous materials that requires placarding. Registration costs range from \$300 to \$2000 and is an annual fee. The completed 2000-2001 registration statement and payment must be submitted before July 1, 2000. If you did not receive the registration form in the mail, please call the USDOT Hazardous Materials Registration Support Center at (800) 942-6990. Also check the web at [hazmat.dot.gov/register.htm](http://hazmat.dot.gov/register.htm)

## New Special Waste Regulations Take Effect July 1, 2000

**REMINDER: Toxic Release Inventory Reports Due July 1, 2000.**



### IDEM/OPPTA

**Compliance and Technical Assistance Program**

**150 West Market Street, Suite 703**

**Indianapolis, IN 46204-2811**

**60-04**